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Attorneys for Debtor / debtor-in-possession

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:)	Case No. 23-30874 DM
)	Chapter 11
)	
ERICK FERNANDO CRESPO,)	STATUS CONFERENCE STATEMENT;
)	CERTIFICATE OF SERVICE
)	
Debtor / debtor-in-possession.)	Date: February 9, 2024
)	Time: 10:00 am
)	Place: **Hearing to be conducted by Tele /
)	Video Conference
)	
)	Judge: Honorable Dennis Montali
)	

**TO THE HONORABLE JUDGE DENNIS MONTALI, THE UNITED STATES
TRUSTEE'S OFFICE FOR THE NORTHERN DISTRICT OF CALIFORNIA, ALL
PARTIES IN INTEREST, AND THEIR RESPECTIVE COUNSEL(S):**

Now comes the Debtor / debtor-in-possession, ERICK FERNANDO CRESPO, by and through his counsel of record, Farsad Law Office, P.C., and hereby submits the instant Status Conference Statement for the Status Conference set for February 9, 2024, at 10:00 a.m. in this Court.

Status Conference Statement; Certificate of Service

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1 **STATUS OF REQUIRED POST-PETITION PAYMENTS TO TAXING AUTHORITIES**

2 All federal and state tax returns are current.

3
4 **WHETHER THE DEBTOR HAS MET THE REQUIREMENTS FOR RETAINING
PROFESSIONALS IN THE CASE**

5 An Ex-Parte Application to Employ the FARSAD LAW OFFICE, P.C. (attorneys Arasto
6 Farsad and Nancy Weng) was filed on January 19, 2024 and an order employing the instant
7 counsel was entered by this Court on January 19, 2024. (Dkt. 25.)
8

9 **ANTICIPATED PROFESSIONAL FEES**

10 The Debtor paid the instant counsel \$15,000.00 plus the Court filing fee of \$1,738.00
11 before the case was filed. Counsel will seek to have this money paid to them via a formal
12 application for fees. The total anticipated fees in this case are around \$20,000.00. (And it may
13 possibly be done with the \$15,000.00 already paid.) The Debtor will not be seeking to hire any
14 other professionals at this time.
15

16 **WHETHER THE DEBTOR HAS MET THE REQUIREMENTS FOR USING CASH
COLLATERAL AND OBTAINING CREDIT**

17 N/A. No income / rents are being collected.
18

19 **ARE THERE ANY ORDERS IN THE CASE THAT HAVE GRANTED RELIEF FROM
20 THE AUTOMATIC STAY, THAT HAVE EXTENDED OR REFUSED TO EXTEND
21 THE AUTOMATIC STAY, OR THAT HAVE DETERMINED THAT THERE IS NO
AUTOMATIC STAY IN EFFECT AS TO ANY OR ALL CREDITORS**

22 None / not applicable.
23

24 **WHETHER ANY MOTIONS TO ASSUME OR REJECT EXECUTORY CONTRACTS
25 OR UNEXPIRED LEASES HAVE BEEN FILED OR ARE EXPECTED TO BE FILED**

26 None / not applicable.
27
28

1 **ATTENDANCE AT THE SECTION 341 MEETING PURSUANT TO 11 U.S.C. 341(a)**

2 The Meeting of Creditors pursuant to Section 341 was held on January 22, 2024 and
3 continued to February 5, 2024 as the Initial Debtor Interview needed to be conducted first.

4
5 **COMPLIANCE WITH UNITED STATES TRUSTEE REQUESTS**

6 The Debtor has provided the US Trustee's Office with the main requested
7 Information, and is working on some of the usual outstanding items after the Initial Debtor
8 Interview held on January 30, 2024.

9
10 **CRAMDOWNS / VALUATION OF ASSETS**

11 The Debtor filed a Motion to Value Collateral regarding the Debtor's residential real
12 property located at 127 Bridgeview Drive, San Francisco, CA 94124 on January 20, 2024. The
13 21-day notice period is still in effect. This is in regards to a junior lien with Fremont Bank that
14 was primarily secured by the Debtor's former business assets / roughly \$1,200,000.00 in trucks.

15
16 **POST-CONFIRMATION SALE OF ASSETS**

17 The Debtor does not currently anticipate the post-confirmation sale of any assets that will
18 require the Court's involvement.

19 **OBJECTION TO CLAIMS**

20 The Debtor does not expect or anticipate objecting to any claims at this time.

21
22 **STATUS OF ANY PENDING LITIGATION IN OR OUTSIDE OF THIS COURT**

23 The Debtor's former employee suit (a labor law based complaint entitled Norma Cristina
24 Verduzco v. Eric Crespo, et al. SF Superior Court case # CGC-21-597211) is pending and stayed
25 due to this filing as well as the related business Chapter 7 filing.

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CERTIFICATE OF SERVICE

****All CM/ECF registrants including the U.S. Trustees Office****